

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<hr/> <b>INTRALINKS, INC.,</b>  <b>EXADEL, INC.,</b>	<b>X</b> : <b>07 CV 8697 (RJS)(AJP)</b>  <b>Plaintiff,</b> :  <b>-against-</b> :  <b>Defendant.</b> : <hr/>
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**DEFENDANT'S  
RULE 26 (a)(1) INITIAL  
DISCLOSURES**

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Defendant Exadel, Inc. ("Defendant") hereby submits its Rule 26(a)(1) initial disclosures:

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information:

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SUBJECT OF INFORMATION: Defendant expects the above-referenced individuals to have knowledge concerning the application architecture and its major components, the software frameworks and their applicability to the project, the project requirements and scope, the statements of work, the agreement between Exadel and Intralinks, the services that were provided by Exadel, the delays that were caused by Intralinks, Intralinks' lack of sophistication and knowledge vis-à-vis computers and software, Intralinks' promises to pay Exadel for the work that it performed, the efforts Exadel expended in servicing Intralinks, the integration work that was performed, the quality of the software that Exadel provided to Intralinks and Intralinks' wrongful refusal to pay the sums due and owing.

(B) A copy of, or description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings.

Defendant identifies the following categories of documents at this time:

- Correspondence
- Statements of Work
- The Contractor Agreement
- Invoices
- Memoranda, facsimiles and email
- Documents from Defendant's Bug Tracking System
- Technical Documents

Documents are maintained at the business offices of the Defendant and the offices of its counsel.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Defendant states that it has been damaged in the amount of \$80,308.80, as reflected by its invoices adjusted to eliminate the discounted rates, plus interest. Defendant reserves the right to supplement this response as discovery proceeds.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any persons carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Defendant is not aware of any applicable insurance.

Defendant reserves its right to supplement these disclosures as more information becomes available during the course of discovery.

Dated: New York, New York  
March 13, 2008

**KANE KESSLER, P.C.**

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